

DOLORES Y. LEAL (134176)
OLIVIA FLECHSIG (334880)
ALLRED, MAROKO & GOLDBERG
6300 Wilshire Blvd. Suite 1500
Los Angeles, CA 90048-5217
(323) 653-6530
dleal@amglaw.com
oflechsig@amglaw.com

Attorneys for Plaintiff MARK SNOOKAL

UNITED STATES DISTRICT COURT
FOR THE CENTRAL DISTRICT OF CALIFORNIA

MARK SNOOKAL, an individual,)	CASE NO.: 2:23-cv-6302-HDV-AJR
)	
)	
Plaintiff,)	PLAINTIFF MARK SNOOKAL'S
)	PROPOSED ADDITIONAL VOIR
)	DIRE QUESTIONS
vs.)	
)	
)	
CHEVRON USA, INC., a California)	District Judge: Hon. Hernan D. Vera
Corporation, and DOES 1 through)	Action Filed: August 3, 2023
10, inclusive,)	Pre-Trial Conf.: July 29, 2025
)	Trial Date: August 19, 2025
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Defendants.)	
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)	

1 Pursuant to the Court’s Civil Trial Order IIA, Plaintiff Mark Snookal hereby
2 submits his Proposed Additional Voir Dire Questions.

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4 1. Have you ever made hiring or job placement decisions?

- 5 ○ If so, did you ever have to consider someone's medical
6 condition or disability?

7 2. Do you believe employers should have wide discretion in making
8 employment decisions?

- 9 ○ How do you balance safety concerns with fairness or legal
10 rights?

11 3. Do you believe employers should have complete discretion to withdraw job
12 offers for any reason, including medical concerns?

- 13 ○ Why or why not?

14 4. Do you think some medical conditions are legitimate reasons not to hire
15 someone, even if their doctor says they’re fit for work?

- 16 ○ Can you think of a situation where that might or might not be
17 justified?

18 5. When you hear the word “disability,” what comes to mind?

19 6. Do you think a person can have a serious medical condition without it being
20 visible?

21 7. Have you or someone close to you ever lived with an invisible disability—
22 like a heart condition, diabetes, epilepsy, or mental health issue?

- 23 ○ Did that person still work or live a full life?

- 24 ○ Did that person work full time despite the invisible disability?

25 8. Do you think people with invisible disabilities should be protected by
26 disability laws, the same way people with visible ones are?

- 27 ○ Why or why not?
28

1 9. How do you feel about employers who say they're just looking out for the
2 employee's own health or safety by not hiring someone with a medical
3 condition even if the employee has been cleared to work by his doctor?

4 ○ Do you think that reasoning should be accepted without
5 question?

6 ○ Why or why not?

7 10. If someone has a heart condition but their cardiologist says they can work
8 safely, should an employer be allowed to ignore that medical opinion?

9 ○ Why or why not?

10 11. Can you think of a time when a person might be unfairly judged as a "risk"?

11 12. Do you think an employer should be required to make decisions based on
12 facts and medical evidence, rather than assumptions or fears?

13 ○ Why or why not?

14 13. The location in this case is of a job in Escravos, Nigeria—a location with
15 limited medical facilities.

16 ○ Does that affect your thinking about whether someone with a
17 stable heart condition should be allowed to work there?

18 ○ Why or why not?

19 14. Do you think people with manageable and stable medical conditions should
20 not be permitted to ever work in remote or developing areas?

21 ○ Why or why not?

22 15. How much do you trust companies to act fairly when it comes to hiring and
23 safety decisions?

24 16. Do you think corporations might sometimes use "health or safety" as a
25 reason to avoid hiring someone?

26 17. Do you tend to believe doctors or corporate health policies more when it
27 comes to someone's fitness for work?

28

1 18. Have you, a family member, or close friend ever had a heart condition or
2 aneurysm?

3 o How did that affect their ability to work or live normally?

4 19. Have you, a family member or close friend ever experienced discrimination
5 or unfair treatment in the workplace because of a medical issue or disability?

6 20. Do you have opinions—positive or negative—about people working with
7 medical conditions?

8 21. Is there anything about this kind of case—a dispute about disability and
9 employment—that makes you feel you can't be neutral or fair?

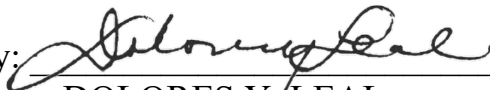
10 22. This case is not about whether the company was cautious — it's about
11 whether they acted lawfully. Can you focus on the law and evidence, not just
12 personal opinions?

13 23. Can you follow the judge's instructions about what the law says a company
14 can and cannot do when making employment decisions?

15 24. Can you keep an open mind until all the evidence is presented, and base
16 your decision only on what happens in this courtroom?

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18 Dated: July 15, 2025

ALLRED, MAROKO & GOLDBERG

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20 By: 

21 DOLORES Y. LEAL
22 OLIVIA FLECHSIG
23 Attorneys for Plaintiff,
24 MARK SNOOKAL
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